

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

MARTELL RODELL DIXON; and  
ASHLEY DANA MARIE HOWARD

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(B), 841(b)(1)(C), and 846; and  
18 U.S.C. §§ 924(c)(1)(A) and 2

**COUNT ONE**

**Possession with Intent to Distribute a Controlled Substance**

The Grand Jury Charges:

On or about March 20, 2023, in the District of North Dakota,

ASHLEY DANA MARIE HOWARD

knowingly and intentionally possessed with intent to distribute 40 grams or more of a  
mixture and substance containing a detectable amount of fentanyl,<sup>1</sup> a Schedule II  
controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

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<sup>1</sup> 21 U.S.C. § 841(b)(1)(A)(vi): The chemical structure of fentanyl is N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide.

COUNT TWO

**Possession with Intent to Distribute a Controlled Substance**

The Grand Jury Further Charges:

On or about March 20, 2023, in the District of North Dakota,

MARTELL RODELL DIXON

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of fentanyl,<sup>2</sup> a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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<sup>2</sup> 21 U.S.C. § 841(b)(1)(A)(vi): The chemical structure of fentanyl is N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide.

COUNT THREE

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime**

The Grand Jury Further Charges:

On or about March 20, 2023, in the District of North Dakota,

ASHLEY DANA MARIE HOWARD

did knowingly possess firearms, to-wit:

1. a Glock, Model 17Gen4, 9mm pistol, Serial Number: BDTH974 (a machinegun);
2. a Kahr Amrs, Model CW45, .45 caliber pistol, Serial Number: SD4067;
3. a Glock, Model 20Gen 4, 10mm pistol, Serial Number BXRV085;

in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, Possess with Intent to Distribute a Controlled Substance, as set forth in Count One of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(B)(ii), and 2.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER  
United States Attorney

RML/tl